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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIEL LUCERO,

Plaintiff,

v.

ISABEL GUZMAN, ADMINISTRATOR
and SMALL BUSINESS
ADMINISTRATION,

Defendants.

Case No. 2:21-cv-00915-RFB-MDC

**Stipulation and Order to
Extend Certain Discovery Deadlines**
(Seventh Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request an extension of the February 29, 2024, deadline to file dispositive motions to March 14, 2024, and all related briefing and JPTO deadlines thereafter, as follows. This is the seventh request for an extension.

DISCOVERY COMPLETED

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures, and Plaintiff supplemented their disclosures.

Defendant served initial discovery requests, and Plaintiff responded to them.

On June 16, 2023, Defendant took Plaintiff's deposition.

On June 22, 2023, Plaintiff took the deposition of former SBA employee Denise Biaggi-Ayer.

DISCOVERY REMAINING

Discovery was completed on July 19, 2023.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

This request concerns only the dispositive motions and related briefing deadlines, and the Joint Pretrial Order deadline. Both counsels have heavy workloads including the undersigned AUSA's – preparation for a settlement conference briefing and conference in *Pina v. US*, Case No. 2:22-cv-01946-ART-MDC, briefs in other cases including answers to complaints. Plaintiff's counsel does not object. For these reasons, the parties agreed to the revised schedule below.

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EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The extension of the remaining deadlines in the case would result in the following revised discovery schedule:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Dispositive Motions	02/29/2024	03/14/2024
Oppositions to Dispositive Motions	04/01/2024	04/15/2024
Replies re Dispositive Motions	04/22/2024	05/06/2024
Proposed Joint Pretrial Order	04/22/2024	05/06/2024 ¹

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 26th day of February 2024.

BLACK & WADHAMS

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/s/ Rusty Graf
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/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 2-28-24

¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.